

EXHIBIT 2

1 A No.

2 Q Did she ask you to testify on her behalf?

3 A No.

4 Q Okay. I'm going to share my screen. I
5 want to ask you about this text message or what
6 appears to be a text message that we were provided.

7 A Oh, I know about that text message.

8 Q Okay. Hold on just a sec. I'll be right
9 with you. Since it appears that you know about this
10 one, we'll go ahead and mark this as Exhibit 2 since
11 we didn't mark the medical record as Exhibit 2. I
12 think we're on Exhibit 2. It does appear that
13 you've seen this text message before?

14 (Exhibit 2 marked for identification.)

15 A Yes.

16 Q Okay. Do you know who sent this text
17 message?

18 A Yes.

19 Q Okay. Who sent this text message?

20 A My mom.

21 Q So Ms. Sanchez sent this text message to
22 Jaylynn Dean?

23 A Yes.

24 Q Okay. Do you -- so before we go any
25 further, it reads "What have you gone and done to

1 yourself and the family this is an embarrassment I
2 told you not to do it why why would you want to
3 bring that kind of attention to yourself you might
4 think you are grown but mentally you aren't why Jay
5 would you do that what are you going to get out of
6 this embarrassment. You just threw your future away
7 no one will ever hire you now." So what makes you
8 think that this was sent by your mother to Ms. Dean?

9 A Jaylynn told me about the message.

10 Q Okay. Had you seen it at the time? Did
11 she show it to you?

12 A She read it to me.

13 Q Okay. What was Ms. Dean's reaction when
14 she received this message?

15 A She was upset. She was very upset. She
16 told my mom that she was going to -- the Dr. Phil
17 show wanted her to go on for -- I guess they were
18 doing a segment on rape victims and Jaylynn had
19 mentioned it to my mom, from my understanding, and
20 my mom was drunk that night and that's what she
21 said.

22 Q Okay. So if I understand you correctly,
23 was this in response to Ms. Dean telling your mother
24 that she was contemplating going on the Dr. Phil
25 show?

1 A It was.

2 Q Okay. And so approximately when -- did
3 you say the Dr. Phil show contacted Ms. Dean?

4 MS. ELLIS: Objection to form.

5 THE WITNESS: I'm not sure of the
6 logistics of that either. I really don't know how
7 all of that came about. I just knew that it was
8 something that was going to happen and that's
9 what -- when she told my mom, that was the message
10 that she got.

11 Q (BY MS. BARTLEY) Okay. So let me just
12 double check just to get as much information as you
13 do know. To your knowledge, did Ms. Dean reach out
14 to the Dr. Phil show?

15 MS. ELLIS: Objection. Form.

16 THE WITNESS: To my knowledge, I don't
17 know how it went into play. I don't know if they
18 reached out to her or if she reached out to them,
19 what happened.

20 Q (BY MS. BARTLEY) Okay. So do you have
21 any knowledge of how Dr. Phil obtained her name?

22 A I don't.

23 MS. ELLIS: Objection. Form.

24 THE WITNESS: I don't.

25 Q (BY MS. BARTLEY) All right. Did Ms. Dean

1 ever take any further steps toward appearing on the
2 Dr. Phil show?

3 MS. ELLIS: Objection. Form.

4 THE WITNESS: She did. She went to New
5 York.

6 Q (BY MS. BARTLEY) Okay. When did she go
7 to New York?

8 MS. ELLIS: Objection. Form.

9 THE WITNESS: I don't remember the date.
10 I don't even remember the month that she went.

11 Q (BY MS. BARTLEY) Okay. Was it in 2023?

12 A I don't remember.

13 Q Was it in 2024?

14 A I don't remember.

15 Q Okay. What's your best estimate of how
16 long after the incident Ms. Dean went to New York to
17 speak to the folks about -- on the Dr. Phil show?

18 MS. ELLIS: Objection. Form.

19 THE WITNESS: There's not an estimate I
20 can give you. I don't want to give you a wrong
21 answer. I don't know.

22 Q (BY MS. BARTLEY) Well, we're only talking
23 about, you know, the last year and a half. So I'm
24 just asking --

25 A It was sometime within the past year and a

1 half she went to Dr. Phil.

2 Q Okay. But it wasn't last month?

3 A No.

4 MS. ELLIS: Objection. Form. Asked and
5 answered.

6 Q (BY MS. BARTLEY) Yeah. And so I'm just
7 asking her, was it in the last six months?

8 MS. ELLIS: Objection. Form. Asked and
9 answered. She's told you repeatedly she does not
10 remember and that it was sometime within the last
11 year and a half.

12 Q (BY MS. BARTLEY) Okay. Here's what I'm
13 going to do. I'm going to give you some -- some --
14 some things in time and maybe she can -- that will
15 help refresh her recollection. Has it been since
16 she started working for the EMS? Did she have to
17 take time off from her work at the EMS as an EMS
18 dispatcher to take a trip to New York?

19 MS. ELLIS: Objection. Form.

20 THE WITNESS: I -- I don't remember.
21 Sometime within the last year possibly, if that was
22 my best estimate.

23 Q (BY MS. BARTLEY) Did anyone go with her
24 to New York?

25 MS. ELLIS: Objection. Form.

1 THE WITNESS: To my understanding, one of
2 her friends.

3 Q (BY MS. BARTLEY) Do you know which friend
4 went with her to New York?

5 MS. ELLIS: Objection. Form.

6 THE WITNESS: I think it was Elisa. Could
7 have been Brooklyn. It was one of them.

8 Q (BY MS. BARTLEY) Okay. And what's your
9 understanding of the purpose of the trip to New
10 York?

11 MS. ELLIS: Objection. Form.

12 THE WITNESS: To meet with Dr. Phil.

13 Q (BY MS. BARTLEY) Okay. Is it your
14 understanding that anything was filmed when she went
15 to New York?

16 MS. ELLIS: Objection. Form.

17 THE WITNESS: I don't know what happened
18 with it. I don't know why she didn't continue it.
19 Again, since all of this has happened, since she was
20 raped, I -- I don't press her. I let her tell me
21 what she wants to. She's an adult and I'm not going
22 to force her to tell me anything.

23 Q (BY MS. BARTLEY) Okay. When you said she
24 didn't continue it, what do you mean by that?

25 MS. ELLIS: Objection. Form.

1 THE WITNESS: I think there was more parts
2 to the show, but she never went back to finish it,
3 to my understanding.

4 Q (BY MS. BARTLEY) Okay. Do you know why
5 she didn't go back?

6 MS. ELLIS: Objection. Form.

7 THE WITNESS: I don't.

8 Q (BY MS. BARTLEY) Okay. So do you have
9 any understanding of whether anything that she may
10 have filmed has broadcast so far --

11 MS. ELLIS: Objection. Form.

12 MS. BARTLEY: Okay. Let me finish my
13 question.

14 MS. ELLIS: I thought you were done. I'm
15 sorry.

16 Q (BY MS. BARTLEY) Do you know whether
17 anything that she has filmed for the Dr. Phil show
18 has been broadcast on TV thus far?

19 MS. ELLIS: Objection. Form.

20 THE WITNESS: To my knowledge, none of it
21 was broadcast because she didn't go back to complete
22 the other segments.

23 Q (BY MS. BARTLEY) Okay. Do you know
24 whether there's any schedule for any of -- anything
25 she's filmed to be broadcast in the future?

1 MS. ELLIS: Objection. Form.

2 THE WITNESS: No.

3 Q (BY MS. BARTLEY) Okay. What is your
4 understanding of what she was asked to speak about
5 --

6 MS. ELLIS: Objection. Form.

7 Q (BY MS. BARTLEY) -- in relation to the
8 Dr. Phil show?

9 MS. ELLIS: Objection. Form.

10 THE WITNESS: I don't know. I just know
11 that it was for people that have been raped by Uber
12 drivers. Again, I don't know what was discussed
13 when she was in New York.

14 Q (BY MS. BARTLEY) Okay. But you do know
15 that it was in relation to an allegation of rape by
16 an Uber driver?

17 A Yes.

18 MS. ELLIS: Objection. Form.

19 Q (BY MS. BARTLEY) Did, to your knowledge,
20 did Ms. Dean respond to this message from her
21 grandmother?

22 MS. ELLIS: Objection. Form.

23 THE WITNESS: If she did, I don't know
24 about it. So not to my knowledge.

25 Q (BY MS. BARTLEY) To your knowledge, was

1 this message from her grandmother, did that form any
2 part of the basis for her decision not to continue
3 the engagement with Dr. Phil?

4 MS. ELLIS: Objection. Form.

5 THE WITNESS: To my knowledge, no.

6 Q (BY MS. BARTLEY) We talked about your
7 employment in the past as a driver for Uber Eats.
8 Have you ever worked in any other capacity as a
9 driver for any other ride share company?

10 A No.

11 Q And have you ever worked as a driver for
12 Uber separate and apart from their -- from their
13 Uber Eats program?

14 A No.

15 Q Okay. And have you ever used Uber to
16 obtain a ride?

17 A No.

18 Q You've never ridden an Uber as a
19 passenger?

20 A No.

21 Q Okay. Have you ever used any other ride
22 share apps as a passenger, like Lyft, for example?

23 A No.

24 Q Okay. After becoming aware of the alleged
25 incident, have you ever advised anyone else not to